EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ • MAD001403526

ATLANTIC GELATIN DIV-GENERAL FOODS COR
HILL ST
WOBURN MA 01801

INSTALLATION ADDRESS ➤ HILL ST
WOBURN MA 01801

EPA Form 8700-12B (4-80) 11/14/80

Request for Handler Information Change in RCRIS
MASS DEP Northeast Region / 935-2165

Handler ID Number (Required) MAD001403526
Handler Name ATLANTIC GELATIN (required)

	Information to Be Replaced	Changed or New Information
Name	ATLANTIC GELATIN	KRAFT GENERAL FOODS
Co. Address		
Mailing		
City, Zip Code		
Contact: Name		
Title		
Telephone		
Ownership Changes Name		NAME: Kraft General Foods
Address		
Telephone		

Date of Change 29 Jul 93

Current RCRA Status (LG) SG VG INAC(7) NA TR B/B
New RCRA Status LG (SG) VG INAC(7) NA TR B/B

Current Waste Oil Status (LG*) SG* VG* UNKNOWN NO OIL
New Waste Oil Status (LG*) SG* VG* NO OIL

Submitted by Bob MARTINACK (MA DEP Person)

Entered by [signature] Date 8-1-94

NOTICE OF EPI ASSESSMENT

MAD ØØ14Ø3526

EPA ID _____ Name Atlantic Gelatin GIS Number _____

This file has been reviewed by CDM Federal Programs Corporation under EPA Contract No. 68-W9-0002, Work Assignment No. R01029. The purpose of this review was to gather information pertaining to the Region I Environmental Priorities Initiative (EPI) and specifically, the GIS-based RCRA Ranking Model and RCRA Facility Data System for the Integrated Environmental Management (IEM) effort.

The following documents have been reviewed:

		DATE	COMMENT
_____	RCRA Facility Assessment	_____	_____
_____	Superfund Preliminary Assessment	_____	_____
_____	Site Inspection	12-20-80	_____
_____	Other Site Inspection	_____	_____
_____	Groundwater Assessment Rpts	_____	_____
_____	3007 "SWMU" Letter Response	_____	_____
_____	Part A Form	_____	_____
_____	Part B Form	_____	_____
✓	Notification Form	10-24-80	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Information regarding this facility is being used in the IEM database. For additional information regarding the GIS Model or the Facility Data System and the status of data available regarding this facility, please contact:

Charles Franks
U.S. EPA Region I
JFK Federal Building, HER-CAN3
Boston, MA 02203

File Reviewed By John F Callan Date 10-14-92

725329-5

081892

MANIFEST SYSTEM DATA BASE CHANGES

This form is to be used when there are minor changes to be made to an original notification, It is NOT to be used for installation operation's address change as this requires a new EPA identification number and a new notification. Return to the Compliance Branch for processing. The person completing this form must be able to produce evidence that the requested changes are accurate. Please print legibly.

Signature of person certifying that the information below is true:

_____

EPA INDENTIFICATION NUMBER: MADO61403526

FORMER NAME General Foods

CHANGE

- [X] Installation name Atlantic Gelatin
- [ ] Mailing address _____
- [ ] Waste Codes: _____
- [ ] Contact name _____
- [ ] Contact Phone number _____

Hazardous Waste Status

This firm should appear on the computer as the checked items below:

_____ Small Quantity Generator

_____ Large Quantity Generator

_____ Licensed Facility (specify):

_____ Licensed Transporter

_____ Wastewater Treatment Unit

- [ ] STATUS:

_____ Active

_____ Inactive as of (date) _____

Reason:

Site ID _____

Part A Application Yes ___ No ___

4

RCRA INSPECTION CHECKLIST

Site Name: Atlantic Gelatin

Site Location: Hill Street

Woburn, MA. 01801

RCRA Contact: Gordon Whitman Bill Collings

Phone No: (617) 933-2800

Inspectors:

EPA: _____

State: _____

Induatry: Ecology and Environment, Inc.

Inspection Date: 12/20/80

Type of Facility: _____

Generator: Sludge and spent solvents

Transporter: Sludges - by contractor

TSD: _____

Permits Issued: _____

In Compliance: Yes _____ No _____

MAD 001403526

I. Generator with Temp. Storage of TSD Facility

A. Pre-Inspection Meeting

1. General Information (Process Description, etc.)

Atlantic Gelatin manufactures food and industrial grade gelatin products. The waste sludge generated at Atlantic Gelatin contains 70% moisture, 4% animal fat, 7% protein and 18% ash according to Mr. Gordon Whitman of Atlantic Gelatin. The wastes are dewatered on site, and the liquid wastes are discharged directly into the M.D.C. and Woburn city sewers. Sludge wastes are sent to the City of Woburn Sanitary Landfill. An average of three truckloads per day of sludge are generated, and as much as a quarter of a million cubic yards of sludge have been disposed of at the landfill. Prior to the development of the landfill, Atlantic Gelatin disposed of sludge waste on site. It is possible that spent acetone or substitute solvent was discarded in the disposal area on Atlantic Gelatin property prior to employing a solvent recovery service.

2. Hazardous Waste Profile

Type of Waste	Amt. of Waste kg/mo	Temp.	Onsite Storage/ TSD	Transporter	Offsite TSD
Sludges	Approximately 2.2 x 10^6 kg/mo (WET)				
may contain methlenechloride					
Spent acetone	3000 gal/6 mo.				
wells on site contaminated with T.C.E.					
Lab wastes disposed of through Resources, Recycling of Braintree, MA.					
Limonene - Found in sludge 3700 ppm					

3. Records

262.21 a.) Manifest

File

1) ~~Document~~ No.: Wetlands Fill 348-15 Mass. Dept. Natural Resources
2) Generator ID, name, address: _____
3) Transporter(s) ID, name, address: _____
4) TSD Facility ID, name address: _____
5) Waste Type & Quantity: _____
6 Date of Acceptance: _____

262.50 i) International Shipping Manifest: _____

262.42 ii) Exceptions Reports: _____

264.13 *b) Waste Analysis Plan:

1. Sampling and test methods: Surface water and soil samples taken
2. Results: Results available January/81

*Not required for temporary storage.

264.15 c) Inspection Schedule and Log of Site

264.15 1. Daily - loading and unloading of areas subject to spills: _____
265.194 - discharge control equipment in tanks: _____
265.34, 265.377 - incinerator system, thermal treatment equipment, chem/phys/biol.
265.403 treatment equipment: _____
265.22[illegible] - freeboard level of surface impoundments: _____

265 [illegible]ly - physical conditions of containers:
26[illegible] " tanks: _____
2[illegible] " surface impoundments: _____
chem/phys/bio. treatment facility: _____

It was learned from Dave Cook on 1/22/81, in a phone conversation that he believed Atlantic Gelantin is conducting regular inspections of the plant, keeping records of transactions, manifests, etc., and the plant is secure. For information on emergency plans the plant should be contacted.

264.16 _____
_____
_____

1.)
2.) De[illegible]
3.) Record[illegible]

e) Contingency Plan

1.) Plan on site: _____
2.) Local authority arrangements: _____
3.) Identify emergency coordinator: _____
4.) List of emergency equipment: _____
5.) Evacuation Plans: _____

B. Inspection

264.14 1. Site Security

a) 24 hour surveillance system _____
b) or Artificial or natural barrier Entire area is fenced
c) and Means to control entry Guard present at gate
d) Danger sign posted at each _____
entrance legible at 25' _____

264.30 - .37

2. Site Preparedness/Prevention

a) Internal communication/alarm _____
b) Telephone/2-way radio _____
c) Portable fire control equipment _____
d) Adequate water for fire control _____
e) Testing and Maintenance of equipment _____
f) Adequate aisle spare _____
g) Access to equipment _____

265.170-177 3. Containers

Leaks Not noted
Ruptures "
Corrosion "
Closed except in use
Heat/Pressure
50' bufferzone for I and R wastes
No smoking signs near I or R waste
Separation of incompatible wastes
Evidence of spills
262.30-34 Pre-transport requirements: packaging
labelling
marking
placarding

265.190-199 4. Tanks

Leaks Not noted
Ruptures "
Corrosion "
≥ 2' freeboard or secondary containment
Heat/pressure
Evidence of spills Booms have been placed in near by stream as a precaution
Inflow controls
Special Requirements for I and R wastes

265.220-.230 5. Surface Impoundments

Protective Cover on Dikes
≥ 2' freeboard
Special requirements for I and R waste

265.250-.257 6. Waste Piles

Wind erosion control odors are present
Prevention of leachate from pile
Special requirements for I and R wastes
Separation of incompatible wastes

265.340
265.382 7. Incinerators/Thermal Treatment

a) Steady State conditions
b) Inspect combustion and emission control instruments every 15 min.
c) Observe stack plume hourly
d) Waste Analysis:
   1) Heating value of waste
   2) Organic halogen content

Incinerators/Thermal Treatment Cont.

3) Sulfur content _____
4) Lead concentrations _____
5) Mercury concentrations _____

e) Evidence of leaks of spills _____
f) Opening burning of explosives or others _____

265.400-.406 8. Phys/Chem/Bio. Treatment

a) Leaks _____
b) Ruptures _____
c) Corrosion _____
d) Waste cut Off _____
e) Waste Analysis _____
f) Special Requirements for I and R wastes _____
g) Special Requirements for incompatible waste _____

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79018
GSA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

not on listing

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).* 000002

DETACH A

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F MAD001403526 T/A 21 C	A	801027

OCT 27 3 14 PM '80

I. NAME OF INSTALLATION

ATLANTIC GELATIN DIV-GENERAL FOODS CORP

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 HILL ST

CITY OR TOWN	ST.	ZIP CODE
4 WOBURN	MA	01801

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 HILL ST

CITY OR TOWN	ST.	ZIP CODE
6 WOBURN	MA	01801

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*	PHONE NO. *(area code & no.)*
2 WILLIAM COLLINS MGR TECH SVCS	617-933-2800

V. OWNERSHIP

DETACH A

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 GENERAL FOODS CORPORATION

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify):*

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

C. INSTALLATION'S EPA I.D. NO.

- [X] A. FIRST NOTIFICATION*
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

By letter on 8/14/80. See attached letter.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

I.D. – FOR OFFICIAL USE ONLY

S												T/A	C
W	M	A	D	0	0	1	4	0	3	5	2	6	2	1
1	2										13	14	15	

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U 0 0 2					
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Ralph L. Cobb	Ralph L. Cobb Vice President-Group Executive	10/24/80

DETACH

DETACH

GENERAL FOODS CORPORATION / 250 North Street, White Plains, N.Y. 10625

RALPH L. COBB
VICE PRESIDENT - GROUP EXECUTIVE

August 14, 1980

U. S. EPA Regional Administrator
EPA Region I
Permits Branch
P. O. Box 8748
Boston, Massachusetts 02114

Dear Sir:

This letter is in response to notification requirements under Section 3010 of the Resource Conservation and Recovery Act (RCRA). Our General Foods Corporation facility at Atlantic Gelatin Division, Woburn, Massachusetts, with mailing address: Hill Street, Woburn, MA 01801 (Contact: W. J. Collins), employs the following:

Solvent	EPA General Code
Acetone	U002

These materials are used in process and are recovered by our facility for reuse or reclamation. As such, we believe their use falls under Subpart A, Section 261.6(a) (1), and 261.6(a) (2), and is not subject to the notification requirements of RCRA, Section 3010, until the Administrator promulgates regulations to the contrary.

We believe in-process storage for recycle and in-process storage for reclamation is specifically exempt under 261.6(a) (1) and (2).

If you disagree with our interpretation of these regulations, would you notify us, so that we might further discuss this matter with you.

Very truly yours,

Ralph L. Cobb

RLC:sem

spoke w/ George Conoolazi

933-2800

GENERAL FOODS CORPORATION / *250 North Street, White Plains, N.Y. 10625*

RALPH L. COBB
VICE PRESIDENT - GROUP EXECUTIVE

August 14, 1980

U. S. EPA Regional Administrator
EPA Region I
Permits Branch
P. O. Box 8748
Boston, Massachusetts 02114

MAD001403526

Dear Sir:

This letter is in response to notification requirements under Section 3010 of the Resource Conservation and Recovery Act (RCRA). Our General Foods Corporation facility at Atlantic Gelatin Division, Woburn, Massachusetts, with mailing address: Hill Street, Woburn, MA 01801 (Contact: W. J. Collins), employs the following:

Solvent	EPA General Code
Acetone	U002

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We believe in-process storage for recycle and in-process storage for reclamation is specifically exempt under 261.6(a) (1) and (2).

If you disagree with our interpretation of these regulations, would you notify us, so that we might further discuss this matter with you.

Very truly yours,

Ralph L. Cobb

RLC:sem

It's constant recycling - they do take 6000 gal off every ... They sell the acetone when it's finished there all. Thus I told him he doesn't have to notify

GENERAL FOODS CORPORATION / *250 North Street, White Plains, N.Y. 10625*

RALPH L. COBB
VICE PRESIDENT - GROUP EXECUTIVE

October 24, 1980

U. S. EPA Regional Administrator
EPA Region I
Permits Branch
P. O. Box 8748
Boston, Massachusetts 02114

Dear Sir:

This letter supplements our letter of August 14, 1980, in response to notification requirements under Section 3010 of the Resource Conservation and Recovery Act (RCRA).

We elect to obtain an EPA Identification Number for our General Foods Corporation facility at Atlantic Gelatin Division, Woburn, Massachusets, with mailing address: Hill Street, Woburn, Massachusetts 01801 (Contact: W. J. Collins).

Very truly yours,

Ralph L. Cobb

RLC:sem
Attachments (2)

cc: Messrs. R. E. Cerosky
W. J. Collins
G. M. Wiseman

CMEL - 3 Rev. 1
10/01/88

FY 1989 RCRA COMPLIANCE MONITORING AND ENFORCEMENT LOG

Initial Evaluation - Massachusetts State Form R-1C

Date Submitted to EPA: 6-14-90	Submitted By: MUHAMMAD AHSAN	New: ☒	Update: ☐	Header Sequence #: ___	Enforcement Action Sequence #: ___

1. EPA ID: (12 Characters) M.A.D.0.0.1.4.0.3.5.2.6 Non-Notifier: ☐ ID # To Be Issued: ☐

2. HANDLER NAME: ATLANTIC GELATIN

3. SITE ADDRESS: (street and town) HILL STREET
WOBURN, MA 01801

MA REGION: C (NE) SE W

4. ACTIVITY TYPE (S): (Check all activity types listed in EPA FOI report for the handler)

☒ Generator ≥ 1000 kg ☐ Generator < 100 kg ☐ TSD LDF ☐ Burn-Blend/H.W. Fuel

☐ Generator 100-999 kg ☐ Transporter ☐ TSD non-LDF ☐ Burn-Blend/Used Oil Fuel

(Waste Oil Handlers: ☐ Gen ≥ 1000 kg ☐ Gen 100-999 kg ☐ Gen < 100 kg)

5a. DATE OF EVALUATION: 05/09/90 (Month/Day/Year)

5b. AGENCY RESPONSIBLE FOR EVALUATION: State *(this form used for State evaluation only)*

6. TYPE OF INITIAL EVALUATION COVERED BY THIS REPORT: Type: 1 (Enter one type)

1 = compliance evaluation inspection (CEI)
2 = sampling inspection
3 = record review
4 = comprehensive GWM inspection (CME)
6 = citizen complaint
8 = Part A withdrawal
9 = closed facility
10 = general (partial)
11 = case development
12 = O&M inspection
13 = corrective action oversight

7. EVALUATION COMMENTS: (Comment in Block 10, below)

8a. CLASS AND VIOLATION AREA: (Enter all that apply)

VIOLATION TYPE
O = no violations
X = new violations
H = high priority violator (HPV)
S = same existing violation as prior evaluation
Z = pending determination
I = insurance violation only (Financial)
B = both financial assurance and insurance violations

Violations/Areas Evaluated								
Class of Violation	GWM	C/PC	Financial	Part B	Comp. Sch.	Manifest	Other	Land Ban
I						O	X	O
II						O	X	O

JUN 13 1990

8b. VIOLATION COMMENTS: (Comment in Block 10, below)

9. ENFORCEMENT ACTIONS:

ENFORCEMENT ACTION TYPE
03 = Warning Letter
04 = Administrative Complaint
05 = Final Administrative Order
10 = Informal Action
11 = Filed Civil Action
12 = Filed Criminal Action
13 = Referred to State
14 = Referred to EPA
15 = 3008 (h) Initial Order
16 = 3008 (h) Final Order
18 = Civil Referral to AG
19 = Final Court Order
21 = NON (Federal Facility Only)
22 = Federal Facility Compliance Agreememt
23 = Federal Facility Referral to Headquarters

Class (I or II)	Area of Violation (refer to Block 8 above)	Type (use codes)	Date Action Taken	Compliance Dates: Scheduled	Compliance Dates: Actual	Penalty Amount (dollars): Assessed	Penalty Amount (dollars): Collected	Resp. Agency (use code)
I/II	OTHER	03						

Responsible Agency:
S = State, X = EPA action in authorized state, E = EPA action in unauthorized state

10. COMMENTS: NO 1" H.W. SIGN, NO LABEL, AREA NOT MARKED, OPEN CONT, NO PER. TR, NO WK. INSP., CONT. PLAN INADEQUATE, NO TELE LIST, NO CONTAINMENT.

DRAFT

LQG-5/88

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING
DIVISION OF HAZARDOUS WASTE
NORTHEAST REGION

NON # 095

LARGE QUANTITY GENERATOR COMPLIANCE INSPECTION CHECKLIST

1407

SITE IDENTIFICATION INFORMATION:

EPA ID #: MAD001403526 Inspection Date: 05/09/90

Site Name: Atlantic Gelatin Site Description: Manufacturing

Site Location: Hill Street

Woburn, MA 01801 Generator Type: LQG

Company Official: Albert Berberian Mixed Waste: ✓

Mailing Address: Same Waste Oil Only: _____

Other: _____

Phone Number: (617) 933-2800 Permits Issued: MWRA, AQC

Inspection Participants/Titles:

State: Muhammad Ahsan / EE

Industry: Albert Berberian / E & R. Compliance Manager

GENERAL INFORMATION/PROCESS DESCRIPTION:

The Atlantic Gelatin, a Division of General Foods Corp., located at Hill Street, Woburn, is manufacturer of gelatin. The gelatin manufacturing process consists of extraction, filtration, evaporation, finishing, fat recovery and waste water treatment operations.

The pigskins are conditioned, chemicals are washed, and the acids are neutralized by using lime or caustic prior to extraction. The extraction process is a series of cooking and draining,

and the gelatin-rich (2-3% gelatin) liquor is collected for further treatment, and the animal fat is released and processed to produce grease oil/cutting and machine oils or similar products.

The gelatin-rich liquor is concentrated (27-30% gelatin), evaporated and passed through an ultrafiltration/pressure relief filters and dryer and finally the product is air-conditioned. The product is crushed, ground to specific size, blended and packaged.

The fat recovery system consists of mixing fat with acetone prior to crystallization. The acetone (pure/anhydrous) is stored in a 30,000 gallon underground storage tank, and is recycled during fat recovery/crystallization. When the moisture content of the acetone reaches one percent, it becomes ineffective and is replaced. At this point the acetone becomes hazardous waste and is transported in a tank truck by NAPPI Trucking Corp. for off-site disposal at Safety Klean Corporation, Linden, NJ.

The process waste water is collected in a clarifier to separate the insoluble fats/oils and settleable solids. The floating fats are skimmed from the clarifier and sent to the recovery system. The waste water goes through a neutralization / pH adjustment process and the treated effluent is discharged under MWRA Permit.

The hazardous wastes generated from the manufacturing activities, include: waste acetone, corrosive and flammable wastes, halogenated/ non-halogenated solvents, waste oils and waste lab packs.

The waste is accumulated into 55-gallon containers (except waste acetone which is transported in a tank truck by Safety Kleen) and transported by Clean Harbors/North East Solvents for off-site disposal.

The facility also generates some wastes subject to Land Disposal Restrictions, such as waste acetone (F003) and waste acids (D002, mostly lab packs).

The house-keeping practices are just OK, could be better.

The Company is in the process of building a new hazardous Waste accumulation area/room. The Atlantic Gelatin has only SPCC Plan which can not be substituted for a Contingency Plan. From the record of the facility, it shows That the weekly inspection of the hazardous waste containers is not being performed and the facility has no personnel Training Plan or training record of the employees. most of the containers accumulating hazardous waste were not properly labelled.

The facility is not in compliance with most of the 310 CMR 30.000 Hazardous Waste Regulations.

Facility Name Atlantic Gelatin - Woburn
EPA I.D.# MAD 001403526
Facility Rep. Albert Berberian
Inspector Muhammad Ahsan
Date May 9, 1990

RCRA LAND DISPOSAL RESTRICTIONS

GENERATOR COMPLIANCE

Restricted Waste Identification

1. F-Solvent Identification

Waste Handled	Specific Wastes
F001 ____	
F002 ____	
F003 ✓	Waste acetone once a year (30,000 gals)
F004 ____	
F005 ____	

Have F-solvent wastes been properly identified? ✓ Y ___ N

(Note: F003 wastestream listed solely for ignitability mixed with a non-restricted solid or hazardous waste and still exhibits ignitability characteristic is subject to the LDR.)

2. Dioxin Identification N/A

Waste Handled		
F020 ____	F023 ____	F028 ____
F021 ____	F026 ____	
F022 ____	F027 ____	

3. California List Identification

Liquid hazardous wastes with cyanides ≥ 1000 mg/l		____
Liquid hazardous wastes with metals or compounds ≥:		
arsenic	500 mg/l	____
cadmium	100 mg/l	____
chromium VI	500 mg/l	____
lead	500 mg/l	____
mercury	20 mg/l	____
nickel	134 mg/l	____
selenium	100 mg/l	____
thallium	130 mg/l	____
Liquid hazardous wastes having a pH ≤ 2		✓ Lab Packs.
Liquid hazardous wastes containing PCBs		
≥50 ppm		____
≥500 ppm		____
Liquid hazardous wastes ≥ 1000 mg/l of Halogenated Organic Compounds (HOCs)		____
Non-liquid hazardous wastes ≥ 1000 mg/kg of HOCs		____

Does the generator handle D002 (corrosive), D004-D011 (EP toxic) or any other wastes that may be subject to the California list standards? [268.7(a)]

Explain below. D002 Lab Pack / waste acids.

Has the generator conducted the paint filter liquids test (Method 9095) to determine if the California list waste is liquid? [268.32(i)]

_____Y ___✓___N

4. First and Second Third Wastes N/A

Does the generator handle any of the following wastes, which are subject to treatment standards?

F006	F007	F008	F009	F010	F011	F012	F024	K001	K005	K007	K009	K010
K011	K013	K014	K015	K016	K018	K019	K020	K021	K022	K023	K024	K025@
K027	K028	K029	K030	K036	K037	K038	K039	K040	K043	K044	K045	K046
K047	K048	K049	K050	K051	K052	K060	K061	K062	K069	K071	K083	K086
K087	K093	K094	K095	K096	K099	K100	K101	K102	K103	K104	K113	K114
K115	K116	P013	P021	P029	P030	P039	P040	P041	P043	P044	P062	P063
P071	P074	P085	P089	P094	P097	P098	P099	P104	P106	P109	P111	P121
U028	U058	U069	U087	U088	U102	U107	U190	U221	U223	U235		

@ K025 nonwastewaters that were disposed of prior to August 17, 1988 are not regulated by LDR.

Does the generator handle any of the following wastes, which are subject to the soft hammer demonstration? N/A

F006*	F019	K004*	K008*	K011*	K013*	K014*	K017	K021*	K022*	K025*	K029*	K031
K035	K041	K042	K046*	K060*	K061*	K069*	K073	K083*	K083**	K084	K085	K086***
K095*	K096*	K097	K098	K101+	K102+	K105	K106	P001	P002	P003	P004	P005
P007	P008	P010	P011	P012	P014	P015	P016	P018	P020	P026	P027	P036
P037	P048	P049	P050	P054	P057	P058	P059	P060	P066	P067	P068	P069
P070	P072	P081	P082	P084	P087	P092	P102	P105	P107	P108	P110	P112
P113	P114	P115	P120	P122	P123	U002	U003	U005	U007	U008	U009	U010
U011	U012	U014	U015	U016	U018	U019	U020	U021	U022	U023	U025	U026
U029	U031	U032	U035	U036	U037	U041	U043	U044	U046	U047	U049	U050
U051	U053	U057	U059	U060	U061	U062	U063	U064	U066	U067	U070	U073
U074	U077	U078	U080	U083	U086	U089	U092	U093	U094	U095	U097	U098
U099	U101	U103	U105	U106	U108	U109	U110	U111	U114	U115	U116	U119
U122	U124	U127	U128	U129	U130	U131	U133	U134	U135	U137	U138	U140
U142	U143	U144	U146	U147	U149	U150	U151	U154	U155	U157	U158	U159
U161	U162	U163	U164	U165	U168	U169	U170	U171	U172	U173	U174	U176
U177	U178	U179	U180	U185	U188	U189	U192	U193	U196	U200	U203	U205
U206	U208	U209	U210	U211	U213	U214	U215	U216	U217	U218	U219	U220
U226	U227	U228	U237	U238	U239	U244	U248	U249				

* Wastewaters from these wastes are subject to the soft hammer provisions.

** K083 wastes with detectable ash are subject to the soft hammer provisions.

*** K086 wastes in the solvent sludges subcategory or the caustic/washwater and sludges subcategory are subject to the soft hammer provisions.

@ K025 nonwastewaters that were disposed of prior to August 17, 1988 are not regulated by LDR.

+ K101 and K102 nonwastewater wastes in the high arsenic subcategory are subject to the soft hammer provisions.

Are any of the soft-hammer wastes also California list wastes? _____Y _____N

(Note: See Appendix A for a listing of California list waste constituents likely to be found in soft-hammer wastes.) Note below.

Recycling Operations

1. Are any of the generator's LDR wastes recycled: onsite? ____Y ✓N
   offsite? ____Y ____N

   If yes, describe recycling process.

2. Were treatment residuals generated from these recycling processes?
   ____Y ____N

Note: The treatment residuals generated from recycling are potentially subject to the land ban. Since the waste residuals are derived from the wastes, they retain the same waste codes as the wastes and are therefore subject to the land ban. The residuals require notifications, certifications, etc. and possibly, further treatment, like any other waste subject to the land ban.

Waste analysis (See treatment standards in Appendix B.)

1. Did generator determine that its wastes are subject to the LDR?
   ✓Y ____N

   If yes, how?

Knowledge of wastes	✓Y	____N
TCLP	____Y	____N
Total Waste Analysis	✓Y	____N
Other	____Y	____N

   Explain for each restricted waste:
   Describe content and basis of applied knowledge:
   [268.7(a)] obtain copies of supporting documentation

   F003

   If determined by TCLP, or total constituent analysis, provide date of last test, frequency of testing and attach test results (if questionable)
   obtain copies of all analyses results

2. Does the generator determine whether the waste exceeds treatment standards? ✓Y ____N

   Do wastes exceed applicable treatment standards upon generation? [268.7(a)(1)]
   ✓Y ____N

   If Yes, indicate which wastes below.

   F003

3. Has the generator conducted any testing or applied knowledge of the soft hammer wastes to determine whether the concentrations qualify the wastes as California list wastes? N/A
   Explain below: ____Y ____N

BDAT Treatment Standard Determination

1. For F-solvents, did the company determine the waste treatability group? ✓ Y ____ N

   Which waste treatability group was chosen?
   Wastewaters containing F001 - F005 solvents ____
   All other spent F001 - F005 solvents ✓

[Wastewaters are defined as F001 - F005 wastes that are primarily water and contain either <1% total organic carbon or <1% total solvents (constituents for which the waste was listed)].

2. For first and second third wastes, did the company determine the waste treatability group? ____ Y ____ N N/A

   Which waste treatability group was chosen?
   Wastewaters ____
   Nonwastewaters ____

[Wastewaters are defined as wastes that contain <1% total organic carbon and <1% total suspended solids (i.e. total filterable solids)].

3. Did the generator correctly determine the treatability groups? [268.41(a) or 268.43]

   For F-solvents? ✓ Y ____ N
   For First and Second Third wastes? ____ Y ____ N

   Please explain (specify which groups for which wastes)

   F003

4. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard? (based on review of process operation, pipe routing, and point of sampling)? [268.3] ____ Y ✓ N

   Please explain.

5. Did the generator mix wastes with differing treatment standards? ____ Y ✓ N

   If so, did the generator select the most stringent treatment standard for each constituent? [268.41(b)] ____ Y ____ N

Offsite Management

1. For all restricted wastes, did the generator provide LDR notifications to the facility(ies) receiving the restricted wastes? [268.7(a)(1)]? ✓ Y ____ N

   If no, for which wastes were no notifications provided?

2. Did the LDR notification contain: [268.7(a)(1) or (a)(2)(i)]

EPA waste number	✓ Y ____ N
Applicable treatment standard	✓ Y ____ N
Manifest number	✓ Y ____ N
Waste Analysis data, if available	____ Y ____ N

(Note: After August 17, 1988, notifications must be retained by the generator.)

3. If the restricted wastes did not exceed treatment standards, did the generator provide to all receiving facilities the certification stating that the waste meets treatment standards? [268.7(a)(2)]? ✓ N/A ____ Y ____ N
   Obtain copies of certification

4. Is any of the generator's waste subject to a: N/A

national capacity extension (NCE)?	____ Y ✓ N
case by case extension?	____ Y ____ N
no migration petition?	____ Y ____ N

   If yes:

   For which wastes?

   Did the generator submit to receiving facility the appropriate LDR notifications with each shipment, containing the following information? [268.7(a)(3)]

EPA waste number	____ Y ____ N
Applicable treatment standard	____ Y ____ N
Manifest number	____ Y ____ N
Waste Analysis data, if available	____ Y ____ N
Wastes subject to extension/petition	____ Y ____ N
Dates when waste is subject to LDR	____ Y ____ N

5. Did the generator retain copies of all notifications/certifications sent with each manifest to offsite facilities? ~~[268.7(a)(6)]~~ ✓ Y ____ N

   Obtain completed copy of notification.

6. For each "soft hammer" waste generated, did the generator do the following: N/A
[268.7(a)(4)&(6)/268.8]

Submit a demonstration to the Regional Administrator prior to initial shipment of the waste directly or indirectly to a landfill or surface impoundment? [268.8(a)(2)]

_____Y _____N

Submit a copy of the demonstration to the receiving facility upon initial shipment of the waste? [268.8(a)(3)&(4)] _____Y _____N

Retain a copy of the demonstration? [268.8(a)(3)] _____Y _____N

Send a copy of the soft hammer certification to the receiving facility with each subsequent shipments? [268.8(a)(3)] _____Y _____N

Retain a copy of each soft hammer certification for all subsequent shipments? [268.7(a)(6)] _____Y _____N

7. Has the Regional Administrator invalidated the soft hammer demonstration?
_____Y _____N

If yes, has the generator ceased shipment of the wastes? [268.8(b)(3)]
_____Y _____N

Do records indicate that the generator has informed all receiving facilities of the invalidation? obtain supporting documentation [268.8(b)(3)]
_____Y _____N

8. Identify (including EPA I.D. #) all offsite facilities receiving restricted wastes:

Clean Harbors MAD 053452637

N.E. Solvents MAD 000604447

Safety Kleen Corp. NJD 002182897

Complete TSDF checklist if waste is stored for more than 90 days or if treatment is conducted on-site.

Checklist valid through May 8, 1990